

April 22, 2003

RE: **Heckett Multiserv 089-16532-00341**

TO: Interested Parties / Applicant

FROM: *Paul Dubenetzky*
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, ISTA Building, 150 W. Market Street, Suite 618, Indianapolis, IN 46204, **within (18) eighteen days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) the date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for consideration at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosure



Governor

Lori F. Kaplan
Commissioner

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Mr. Gene A. Iannazzo
Heckett MultiServ Plant 7
P.O. Box 351
Whiting, Indiana 46394

April 22, 2003

Re: Significant Source Modification No:
089-16532-00341

Dear Mr. Iannazzo:

Heckett MultiServ Plant 7 applied for a Part 70 operating permit on October 31, 1996 for a slag and kish separating and conveying operation. An application to modify the source was received on December 3, 2002. Pursuant to 326 IAC 2-7-10.5 the following emission units are approved for construction at the source:

- (a) One portable kish iron screening plant, with a maximum throughput rate of 200 tons of kish iron per hour, controlled by water suppression, consisting of the following:
 - (1) One (1) raw material feeder, with a maximum throughput rate of 200 tons of kish iron per hour.
 - (2) One (1) double screen, with a maximum throughput rate of 200 tons of kish iron per hour.
 - (3) Five (5) conveyors, each with a maximum throughput rate of 200 tons of kish iron per hour, consisting of the transfer points #2, #3, #4, #6, #7, and #9.
 - (4) Three (3) storage piles, with a total maximum throughput rate of 200 tons per hour.
- (b) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.
- (c) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons.
- (d) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (e) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.

The proposed Significant Source Modification approval will be incorporated into the pending Part 70 permit application pursuant to 326 IAC 2-7-10.5(l)(3). If there are no changes to the proposed construction of the emission units, the source may begin operating on the date that IDEM receives an affidavit of construction pursuant to 326 IAC 2-7-10.5(h). If there are any changes to the proposed construction the source can not operate until an Operation Permit Validation Letter is issued.

Pursuant to Contract No. A305-0-00-36, IDEM, OAQ has assigned the processing of this application to Eastern Research Group, Inc., (ERG). Therefore, questions should be directed to Yu-Lien Chu, ERG, 1600 Perimeter Park Drive, Morrisville, North Carolina 27560, or call (919) 468-7871 to speak directly to Ms. Chu. Questions may also be directed to Duane Van Laningham at IDEM, OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call (800) 451-6027, press 0 and ask for Duane Van Laningham, or extension 3-6878, or dial (317) 233-6878.

Sincerely,
Original signed by
Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments
ERG/YC

cc: File - Lake County
U.S. EPA, Region V
Lake County Health Department
East Chicago Department of Environmental Management
Northwest Regional Office
Air Compliance Section Inspector - Rick Massoels
Compliance Data Section - Karen Nowak
Administrative and Development - Sara Cloe
Technical Support and Modeling - Michele Boner



Governor

Lori F. Kaplan
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PART 70 SIGNIFICANT SOURCE MODIFICATION OFFICE OF AIR QUALITY AND EAST CHICAGO DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

Heckett MultiServ Plant 7 ISG Steel - West End Slag Dump East Chicago, Indiana 46312

(herein known as the Permittee) is hereby authorized to construct and operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this approval.

This approval is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

First Significant Source Modification No.: 089-16532-00341

Issued by: **Original signed by**
Paul Dubenetzky, Branch Chief
Office of Air Quality

Issuance Date: **April 22, 2003**



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SECTION A

SOURCE SUMMARY

This approval is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ), and the East Chicago Department of Environmental Management. The information describing the emission units contained in conditions A.1 through A.4 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this approval pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary slag and kish separating and conveying operation.

Responsible Official:	Executive V.P. and General Manager
Source Address:	ISG Steel - West End Slag Dump, East Chicago, Indiana 46312
Mailing Address:	P.O. Box 351, Whiting, Indiana 46394
General Source Phone Number:	(219) 397-4724
SIC Code:	3295
County Location:	Lake
Source Location Status:	Nonattainment for Ozone, PM10 and SO ₂ Attainment for all other criteria pollutants
Source Status:	Part 70 Permit Program Major Source, under PSD; Major Source, Section 112 of the Clean Air Act 1 of 28 Source Categories

A.2 Part 70 Source Definition [326 IAC 2-7-1(22)]

This steel manufacturing facility consists of a source with an on-site contractor:

- (a) ISG Steel (formerly LTV Steel Company), the primary operation, is located at 3001 Dickey Road, East Chicago, Indiana (Plant ID #089-00377); and
- (b) Heckett MultiServ Plant 7, the supporting operation, is located at ISG Steel - West End Slag Dump, East Chicago, Indiana (Plant ID #089-00341).

IDEM has determined that ISG Steel and Heckett MultiServ Plant 7 are under common control of ISG steel. These two plants are considered one source due to the contractual control. Therefore, the term "source" in the Part 70 documents refers to both ISG Steel and Heckett MultiServ Plant 7 as one source.

A.3 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source is approved to construct and operate the following emission units and pollution control devices:

One portable kish iron screening plant, with a maximum throughput rate of 200 tons of kish iron per hour, controlled by water suppression, consisting of the following:

- (a) One (1) raw material feeder, with a maximum throughput rate of 200 tons of kish iron per hour.
- (b) One (1) double screen, with a maximum throughput rate of 200 tons of kish iron per hour.

- (c) Five (5) conveyors, each with a maximum throughput rate of 200 tons of kish iron per hour, consisting of the transfer points #2, #3, #4, #6, #7, and #9.
- (d) Three (3) storage piles, with a total maximum throughput rate of 200 tons per hour.

A.4 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
[326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons. [326 IAC 8-9]

A.5 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONSTRUCTION CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

B.2 Effective Date of the Permit [IC13-15-5-3]

Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.

B.3 Revocation of Permits [326 IAC 2-1.1-9(5)][326 IAC 2-7-10.5(i)]

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

B.4 Significant Source Modification [326 IAC 2-7-10.5(h)]

This document shall also become the approval to operate pursuant to 326 IAC 2-7-10.5(h) when, prior to start of operation, the following requirements are met:

- (a) The attached affidavit of construction shall be submitted to the Office of Air Quality (OAQ), Permit Administration & Development Section, verifying that the emission units were constructed as proposed in the application. The emissions units covered in the Significant Source Modification approval may begin operating on the date the affidavit of construction is postmarked or hand delivered to IDEM if constructed as proposed.
- (b) If actual construction of the emissions units differs from the construction proposed in the application, the source may not begin operation until the source modification has been revised pursuant to 326 IAC 2-7-11 or 326 IAC 2-7-12 and an Operation Permit Validation Letter is issued.
- (c) If construction is completed in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any permit conditions associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.
- (d) The Permittee shall receive an Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section and attach it to this document.
- (e) In the event that the Part 70 application is being processed at the same time as this application, the following additional procedures shall be followed for obtaining the right to operate:
 - (1) If the Part 70 draft permit has not gone on public notice, then the change/addition covered by the Significant Source Modification will be included in the Part 70 draft.
 - (2) If the Part 70 permit has gone through final EPA proposal and would be issued ahead of the Significant Source Modification, the Significant Source Modification will go through a concurrent 45 day EPA review. Then the Significant Source Modification will be incorporated into the final Part 70 permit at the time of issuance.
 - (3) If the Part 70 permit has gone through public notice, but has not gone through final EPA review and would be issued after the Significant Source Modification is

issued, then the Modification would be added to the proposed Part 70 permit, and the Title V permit will issued after EPA review.

SECTION C GENERAL OPERATION CONDITIONS

C.1 Certification [326 IAC 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

C.2 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) when operation begins, including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

East Chicago Department of Environmental Management
4522 Indianapolis Boulevard
East Chicago, Indiana 46312

The PMP extension notification does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, and East Chicago Department of Environmental Management upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ, and East Chicago Department of

Environmental Management. IDEM, OAQ, and East Chicago Department of Environmental Management may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner or East Chicago Department of Environmental Management makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or East Chicago Department of Environmental Management within a reasonable time.

C.3 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

East Chicago Department of Environmental Management
4522 Indianapolis Blvd.
East Chicago, Indiana 46312

Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

C.4 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of twenty percent (20%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Operation of Equipment [326 IAC 2-7-6(6)]

Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission unit vented to the control equipment is in operation.

Compliance Requirements [326 IAC 2-1.1-11]

C.7 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.8 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

If required by Section D, all monitoring and record keeping requirements shall be implemented when operation begins. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment.

C.9 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.10 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:
 - (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.
 - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:

- (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
 - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
 - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.
 - (4) Failure to take reasonable response steps shall constitute a violation of the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
- (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.
 - (3) An automatic measurement was taken when the process was not operating.
 - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.11 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the

affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
- (2) The permitted facility was at the time being properly operated;
- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, and East Chicago Department of Environmental Management within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

For IDEM, OAQ:

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

For the East Chicago Environmental Management:

Telephone Number: 219-391-8297
Facsimile Number: 219-391-8237

For the Northwest Regional Office:

Telephone Number: 1-800-209-8892 or
Telephone Number: 219-881-6712
Facsimile Number: 219-881-6745

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

East Chicago Department of Environmental Management
4522 Indianapolis Blvd.
East Chicago, Indiana 46312

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, and East Chicago Department of Environmental Management may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(10) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, and East Chicago Department of Environmental Management by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

C.12 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]
[326 IAC 2-7-6]

-
- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
 - (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
 - (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.13 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

-
- (a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner and East Chicago Department of Environmental Management makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner and East Chicago Department of Environmental Management within a reasonable time.
 - (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.14 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

- (a) The reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

East Chicago Department of Environmental Management
4522 Indianapolis Blvd.
East Chicago, Indiana 46312
- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and East Chicago Department of Environmental Management on or before the date it is due.
- (c) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

One portable kish iron screening plant, with a maximum throughput rate of 200 tons of kish iron per hour, controlled by water suppression, consisting of the following:

- (a) One (1) raw material feeder, with a maximum throughput rate of 200 tons of kish iron per hour.
- (b) One (1) double screen, with a maximum throughput rate of 200 tons of kish iron per hour.
- (c) Five (5) conveyors, each with a maximum throughput rate of 200 tons of kish iron per hour, consisting of the transfer points #2, #3, #4, #6, #7, and #9.
- (d) Three (3) storage piles, with a total maximum throughput rate of 200 tons per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration), the allowable PM emission rates from the feeder, each conveyor transfer point, and the screen shall not exceed the emission rates listed in the table below:

Emission Units	PM Emission Limit (lbs/hr)
Feeder	0.176
Each Conveyor Transfer Point (#2, #3, #4, #6, #7, and #9)	0.020
Screen	1.235

This is equivalent to 6.71 tons/yr of PM emissions. Combined with the PM emissions from the storage piles (fugitive emissions) and the insignificant activities, the PM emissions from this modification are limited to less than 25 tons per year. Therefore, the requirements of 326 IAC 2-2 are not applicable.

D.1.2 Emission Offset Minor Limit [326 IAC 2-3]

Pursuant to 326 IAC 2-3 (Emission Offset), the allowable PM10 emission rates from the feeder, each conveyor transfer point, and the screen shall not exceed the emission rates listed in the table below:

Emission Units	PM10 Emission Limit (lbs/hr)
Feeder	0.086
Each Conveyor Transfer Point (#2, #3, #4, #6, #7, and #9)	0.010

Screen	0.588
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This is equivalent to 3.21 tons/yr of PM10 emissions. Combined with the PM10 emissions from the storage piles (fugitive emissions) and the insignificant activities, the PM10 emissions from this modification are limited to less than 15 tons per year. Therefore, the requirements of 326 IAC 2-3 are not applicable.

D.1.3 Particulate Matter (PM) [326 IAC 6-1-2(a)]

Pursuant to 326 IAC 6-1-2(a)(Nonattainment Area Particulate Limitations), particulate matter (PM) emissions from each of the feeder, conveyor transfer point, and the screen of the screening plant shall not exceed 0.03 grain per dry standard cubic foot of exhaust air.

Compliance Determination Requirements

D.1.4 PM and PM10 Control

In order to comply with Conditions D.1.1 and D.1.2, the Permittee shall use wet suppression to control emissions of PM and PM10 from the feeder, conveyors, and the screen at all times these emission units are in operation. The suppressant shall be applied in a manner and at a frequency sufficient to ensure compliance with 326 IAC 2-2, 326 IAC 2-3, and 326 IAC 6-1-2(a). If weather conditions preclude the use of wet suppression, the permittee shall perform chemical analysis on the slag material to ensure it has a moisture content greater than 2.9 percent.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.5 Visible Emissions Notations

- (a) Visible emission notations of the exhausts from the feeder, the conveyor transfer points #2, #3, #4, #6, #7, and #9, and the screen shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.6 Record Keeping Requirements

- (a) To document compliance with Condition D.1.4, the Permittee shall maintain records of the chemical analysis of the slag material, as needed.
- (b) To document compliance with Condition D.1.5, the Permittee shall maintain records of daily visible emission notations of the finishing operation.

- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements of this permit.

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Insignificant Activities

Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons. [326 IAC 8-9]

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Volatile Organic Compounds (VOC) [326 IAC 8-9]

Pursuant to 326 IAC 8-9-6 (Volatile Organic Liquid Storage Vessels), the owner or operator of a stationary vessel with a capacity of less than thirty-nine thousand (39,000) gallons, and which is not exempt, shall maintain a record and submit to the department a report containing the following information on the vessel:

- (a) The vessel identification number.
- (b) The vessel dimensions.
- (c) The vessel capacity.
- (d) A description of the emission control equipment for each vessel described in 326 IAC 8-9-4 (a) and 4 (b), applicable, or a schedule for installation of emission control equipment on vessels described in 326 IAC 8-9-4(a) and 4 (b), if applicable, with a certification that the emission control equipment meets the applicable standards.

The owner or operator of a stationary vessel shall keep all records as described for the life of the vessel.

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.2 Record Keeping Requirements

To document compliance with Condition D.2.1, a report containing the information described in Condition D.2.1 shall be submitted to IDEM, OAQ, and East Chicago Department of Environmental Management.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
AND
EAST CHICAGO DEPARTMENT OF
ENVIRONMENTAL MANAGEMENT**

**PART 70 SOURCE MODIFICATION
CERTIFICATION**

Source Name: Heckett MultiServ Plant 7
Source Address: ISG Steel - West End Slag Dump, East Chicago, Indiana 46312
Mailing Address: P.O. Box 351, East Chicago, Indiana 46312
Source Modification No. 089-16532-00341

:

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this approval.

Please check what document is being certified:

- 9 Test Result (specify) _____
- 9 Report (specify) _____
- 9 Notification (specify) _____
- 9 Affidavit (specify) _____
- 9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

April 22, 2003

**Indiana Department of Environmental Management
Office of Air Quality
and
East Chicago Department of Environmental Management**

**Technical Support Document (TSD) for a
Part 70 Significant Source Modification**

Source Background and Description

Source Name:	Heckett MultiServ Plant 7
Source Location:	ISG Steel - West End Slag Dump, East Chicago, Indiana 46312
County:	Lake
SIC Code:	3295
Operation Permit No.:	089-7066-00341
Operation Permit Issuance Date:	Pending
Significant Source Modification No.:	089-16532-00341
Permit Reviewer:	ERG/YC

The Office of Air Quality (OAQ) has reviewed a modification application from Heckett MultiServ Plant 7, a contractor of ISG Steel, relating to the construction of the following emission units and pollution control devices:

- (a) One portable kish iron screening plant, with a maximum throughput rate of 200 tons of kish iron per hour, controlled by water suppression, consisting of the following:
 - (1) One (1) raw material feeder, with a maximum throughput rate of 200 tons of kish iron per hour.
 - (2) One (1) double screen, with a maximum throughput rate of 200 tons of kish iron per hour.
 - (3) Five (5) conveyors, each with a maximum throughput rate of 200 tons of kish iron per hour, consisting of the transfer points #2, #3, #4, #6, #7, and #9.
 - (4) Three (3) storage piles, with a total maximum throughput rate of 200 tons per hour.
- *(b) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.
- *(c) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage

capacity less than or equal to 10,500 gallons.

- *(d) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- *(e) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.

* Note: These units are considered insignificant activities as defined in 326 IAC 2-7-1(21).

History

On December 3, 2002, Heckett MultiServ Plant 7, a contractor to ISG Steel (formerly LTV Steel Company) submitted an application to the OAQ requesting to add a portable kish iron screening operation to their existing plant. Heckett MultiServ Plant 7 applied for a Part 70 permit (T089-7066-00341) on October 31, 1996 and this Part 70 permit is currently being reviewed by IDEM, OAQ.

Source Definition

This steel manufacturing facility consists of a source with an on-site contractor:

- (a) ISG Steel (formerly LTV Steel Company), the primary operation, owns and operates the steel plant, located at 3001 Dickey Road, East Chicago, Indiana (Plant ID # 089-00377); and
- (b) Heckett MultiServ Plant 7, the supporting operation, owns and operates a slag and kish separating and conveying plant, located at ISG Steel - West End Slag Dump, East Chicago, Indiana (Plant ID # 089-00341).

IDEM has determined that ISG Steel and Heckett MultiServ Plant 7 are one source under 326 IAC 2-7 and this determination still applies to this source modification. These two plants are considered one source due to the contractual control. Therefore, the term "source" in the Part 70 documents refers to both ISG Steel and Heckett MultiServ Plant 7 as one source.

Separate Part 70 permits will be issued to ISG Steel and Heckett MultiServ Plant 7 solely for administrative purpose.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Part 70 Significant Source Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on December 3, 2002. Additional information was received on January 3, 2003.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (pages 1 through 3).

Potential To Emit of Modification

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA.”

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	183.7
PM-10	87.6
SO ₂	--
VOC	Negligible
CO	--
NO _x	--

HAP's	Potential To Emit (tons/year)
TOTAL	Negligible

Justification for Modification

The Part 70 Operating permit is being modified through a Part 70 Significant Source Modification. This modification is being performed pursuant to 326 IAC 2-7-10.5 (f)(4)(A) as the potential to emit PM and PM10 is each greater than twenty-five (25) tons per year.

County Attainment Status

The source is located in Lake County.

Pollutant	Status
PM-10	Moderate Nonattainment
SO ₂	Primary Nonattainment
NO ₂	Attainment
Ozone	Severe Nonattainment
CO	Maintenance Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Lake County has been designated as severe nonattainment for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3.

- (b) Lake County has been designated as nonattainment for PM₁₀ and SO₂. Therefore, PM₁₀ and SO₂ emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3.
- (c) Lake County has been classified as attainment for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (d) Fugitive Emissions
 Since this type of operation is one of the 28 listed source categories under 326 IAC 2-2, 40 CFR 52.21, and 326 IAC 2-3, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are counted toward determination of PSD and Emission Offset applicability.

Source Status

Existing Source PSD or Emission Offset Definition (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/year)
PM	Greater than 100
PM-10	Greater than 100
SO ₂	Less than 100
VOC	Less than 100
CO	Less than 100
NO _x	Less than 100

- (a) This existing source is a major stationary source because one or more regulated pollutants are emitted at a rate of 100 tons per year or more, and it is one of the 28 listed source categories.
- (b) These emissions are based upon the Technical Support Document (TSD) for minor source modification #089-12067-00341, issued May 25, 2000.

Potential to Emit of Modification After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 source modification.

Process/facility	Potential to Emit (tons/year)						
	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
Feeder	Less than 0.77	Less than 0.38	-	-	-	-	-
Six (6) Conveyor Transfer Points	Less than 0.53	Less than 0.25	-	-	-	-	-

Double Screen	Less than 5.41	Less than 2.58	-	-	-	-	-
Storage Piles	2.37	1.12	-	-	-	-	-
Insignificant Activities	-	-	-	Negligible	-	-	Negligible
Total PTE of the Modification	Less than 9.08	Less than 4.33	-	Negligible	-	-	Negligible
PSD and Emission Offset Thresholds	25	15	40	25	100	40	NA

*Note: Since this source is one of the 28 source categories under 326 IAC 2-2, 40 CFR 51.21, and 326 IAC 2-3, the fugitive particulate matter (PM) emissions from the storage piles are counted towards determination of PSD and Emission Offset applicability.

- (a) This modification to an existing major stationary source is not major because the emission increase is less than the PSD and Emission Offset significant levels. Therefore, pursuant to 326 IAC 2-2, 326 IAC 2-3, and 40 CFR 52.21, the PSD and Emission Offset requirements do not apply.
- (b) The PM emissions from the entire project are limited to 9.08 tons/yr, and the PM10 emissions are limited to 4.33 tons/yr. This is attained by the use of wet suppression to control the emissions from this screening plant.

Federal Rule Applicability

- (a) This significant modification does not involve a pollutant-specific emissions unit:
 - (1) with the potential to emit before controls equal to or greater than one hundred (100) tons per year, and
 - (2) that is subject to an emission limit and has a control device that is necessary to meet that limit.

Therefore, the requirements of 40 CFR Part 64, Compliance Assurance Monitoring, are not applicable.

- (b) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this proposed modification.
- (c) This new screening plant processes the kish iron received from the steel mill, and kish iron does not meet the definition of “nonmetallic mineral” in 40 CFR 60.671. Therefore, the New Source Performance Standards (NSPS) for Nonmetallic Mineral Processing Plants (40 CFR 60.670-676, Subpart OOO) are not applicable.
- (d) The storage tanks have capacities less than 40 cubic meters (10,560 gallons). Therefore, the New Source Performance Standards for Volatile Organic Liquid Storage Vessels for which construction, reconstruction, or modification commenced after July 23, 1984 (40 CFR 60.110b - 117b, Subpart Kb) are not applicable to these tanks.
- (e) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source.

State Rule Applicability - The Screening Plant

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity for sources located in Lake County shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of twenty percent (20%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 2-2 (Prevention of Significant Deterioration (PSD))

This source is in 1 of the 28 source categories defined in 326 IAC 2-2-1(p)(1) and has the potential to emit of PM greater than 100 tons/yr. Therefore, the existing source is a PSD major source. In order for this construction project to be considered a minor modification, the PM emissions from the feeder, each conveyor transfer point, and the screen of the propose screening plant shall not exceed the emission rates listed in the table blew:

Emission Units	PM Emission Limit (lbs/hr)
Feeder	0.176
Each Conveyor Transfer Point (#2, #3, #4, #6, #7, and #9)	0.020
Screen	1.235

This is equivalent to 6.71 tons/yr of PM emissions. Combined with the PM emissions from the storage piles (fugitive emissions) and the insignificant activities, the PM emissions from this project will be limited to less than 25 tons per year. The use of wet suppression ensures compliance with these limits. Therefore, the requirements of 326 IAC 2-2 are not applicable.

326 IAC 2-3 (Emission Offset)

This existing source is located in Lake County (nonattainment area for Ozone, PM10 and SO₂) and has potential to emit PM10 greater than 100 tons/yr. Therefore, the existing source is a Emission Offset major source. In order for this construction project to be considered a minor modification, the PM10 emissions from the feeder, each conveyor transfer point, and the screen of the propose screening plant shall not exceed the emission rates listed in the table blew:

Emission Units	PM10 Emission Limit (lbs/hr)
Feeder	0.086
Each Conveyor Transfer Point (#2, #3, #4, #6, #7, and #9)	0.010
Screen	0.588

This is equivalent to 3.21 tons/yr of PM10 emissions. Combined with the PM10 emissions from the storage piles (fugitive emissions) and the insignificant activities, the PM10 emissions from this

project will be limited to less than 15 tons per year. The use of wet suppression ensures compliance with these limits. Therefore, the requirements of 326 IAC 2-3 are not applicable.

326 IAC 2-4.1 (New Sources of Hazardous Air Pollutants)

The potential to emit HAPs from the proposed modification is less than the major source thresholds. Therefore, the requirements of 326 IAC 2-4.1 are not applicable.

326 IAC 6-1-2(a)(Nonattainment Area Particulate Limitations)

This source is located in Lake County. Therefore, particulate matter (PM) emissions from the feeder, each of the conveyor transfer points, and the screen shall not exceed 0.03 grains per dry standard cubic foot (dscf) of exhaust air.

326 IAC 6-1-10 (Lake County PM10 Emission Requirements)

This source is one of the sources listed under 326 IAC 6-1-10 (Lake County PM10 Emission Requirements). However, there is no specific requirement for the proposed screening plant.

326 IAC 6-1-11.1 (Lake County Fugitive Particulate Matter Control Requirements)

This source is located in Lake County and the potential to emit fugitive particulate matter from the storage piles is less than 5 tons per year. Therefore, the requirements of 326 IAC 6-1-11.1 are not applicable.

326 IAC 6-3 (Process Operation)

The feeder, each of the conveyor transfer point, and the screen of the proposed screening plant are subject to the requirements contained in 326 IAC 6-1-2(a)(Nonattainment Area Particulate Limitations). Therefore, these emission units are exempt from the requirements of 326 IAC 6-3, pursuant to 326 IAC 6-3-1(b)(1).

326 IAC 6-4 (Fugitive Dust Emissions)

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

326 IAC 6-5-1 (Fugitive Particulate Matter Emission Limitations)

This source is located in Lake County and the potential to emit fugitive particulate matter from the storage piles is less than 25 tons per year. Therefore, the requirements of 326 IAC 6-5-1 are not applicable.

State Rule Applicability - Insignificant Activities

326 8-4-3 (Petroleum Liquid Storage Facilities)

The storage tanks have capacities less than 39,000 gallons. Therefore, the requirements of 326 IAC 8-4-3 are not applicable to these tanks.

326 IAC 8-9 (Volatile Organic Liquid Storage Vessels)

This source is located in Lake County, therefore, the volatile organic liquid storage vessels of this modification are subject to 326 IAC 8-9. Since these storage tanks have the capacities less than 39,000 gallons, these tanks are subject to the reporting and record keeping provisions of 326 IAC 8-9-6(a) and (b), which have the following requirements:

(a) The owner or operator of each vessel shall maintain records for the life of the vessel for the following information:

(1) The vessel identification number.

- (2) The vessel dimensions.
 - (3) The vessel capacity.
 - (4) A description of the emission control equipment for each vessel described in 326 IAC 8-9-4 (a) and 4 (b), applicable, or a schedule for installation of emission control equipment on vessels described in 326 IAC 8-9-4(a) and 4 (b), if applicable, with a certification that the emission control equipment meets the applicable standards.
- (b) A report containing the information described in (a) shall be submitted to IDEM, OAQ, and East Chicago Department of Environmental Management.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this modification are as follows:

1. The feeder, each conveyor transfer point, and the double screen have applicable compliance monitoring conditions as specified below:

Visible emissions notations of the the feeder, each conveyor transfer point, and the double screen exhausts shall be performed once per shift during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

These monitoring conditions are necessary because the feeder, the conveyors, and the double screen must operate properly to ensure compliance with 326 IAC 2-2 (PSD), 326 IAC 2-3 (Emission Offset), and 326 IAC 6-1-2(a) (Nonattainment Area Particulate Limitations).

Conclusion

The construction of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Source Modification No. 089-16532-00341.

Appendix A: Emission Calculations
PM10 Emissions
From the Portable Kish Iron Screening Plant

Company Name: Heckett MultiServ Plant 7
Address City IN Zip: W. End Slag Dump, East Chicago, IN 46312
SSM #: 089-16532-00341
Reviewer: ERG/YC
Date: January 7, 2003

Maximum Throughput Rate:

200 (tons/hr)

Process	Number of Units	Uncontrolled PM10 Emission Factor (lbs/ton)	Uncontrolled PTE of PM10 (lbs/hr/unit)	Uncontrolled PTE of PM10 (tons/yr)	Controlled PM10 Emission Factor (lbs/ton)	Controlled PTE of PM10 (lbs/hr/unit)	Controlled PTE of PM10 (tons/yr)
*Feeder	1	0.0043	0.860	3.77	0.000430	0.086	0.38
**Conveyor Transfer Points	6	0.0014	0.280	7.36	0.000048	0.010	0.25
***Double Screener	1	0.0860	17.200	75.34	0.002940	0.588	2.58
Total				86.46			3.20

* The emission factor for the feeder is the one for low silt batch drop from iron and steel mill in AP-42, Table 12.5.4 (10/86). The controlled emission factor is calculated assuming 90% control by wet suppression.

** The uncontrolled and controlled emission factor for the conveyor transfer point is from AP-42, Chapter 11.19, Table 11.19.2-2 - Crushed stone processing operations (AP-42 01/95). The controlled emission factors reflect water suppression.

*** Since this is a double screener, the emission factor is the sum of emission factors for the screening and fine screening in AP-42, Table 11.19.2-2 (01/95).

Methodology

Uncontrolled Emissions (lbs/hr/unit) = Maximum Throughput (tons/hr) x Uncontrolled Emission Factor (lb/ton)

Uncontrolled Emissions (tons/yr) = Uncontrolled Emissions (lbs/hr/unit) x Number of Units x 8760 hr/yr x 1 ton/2000 lbs

Controlled Emissions (lbs/hr/unit) = Maximum Throughput (tons/hr) x Controlled Emission Factor (lb/ton)

Controlled Emissions (tons/yr) = Controlled Emissions (lbs/hr/unit) x Number of Units x 8760 hr/yr x 1 ton/2000 lbs

Appendix A: Emission Calculations
PM Emissions
From the Portable Kish Iron Screening Plant

Company Name: Heckett MultiServ Plant 7
Address City IN Zip: W. End Slag Dump, East Chicago, IN 46312
SSM #: 089-16532-00341
Reviewer: ERG/YC
Date: January 7, 2003

Maximum Throughput Rate:

200

 (tons/hr)

Process	Number of Units	Uncontrolled PM Emission Factor (lbs/ton)	Uncontrolled PTE of PM (lbs/hr/unit)	Uncontrolled PTE of PM (tons/yr)	Controlled PM Emission Factor (lbs/ton)	Controlled PTE of PM (lbs/hr/unit)	Controlled PTE of PM (tons/yr)
*Feeder	1	0.0088	1.760	7.71	0.000880	0.176	0.77
**Conveyor Transfer Points	6	0.00294	0.588	15.45	0.000101	0.020	0.53
***Double Screener	1	0.1806	36.120	158.21	0.006174	1.235	5.41
Total				181.37			6.71

* The emission factor for the feeder is the one for low silt batch drop from iron and steel mill in AP-42, Table 12.5.4 (10/86). The controlled emission factor is calculated assuming 90% control by wet suppression.

** The uncontrolled and controlled emission factor for the conveyor transfer point is from AP-42, Chapter 11.19, Table 11.19.2-2 - Crushed stone processing operations (AP-42 01/95). The controlled emission factors reflect water suppression. Assume all TSP emissions equal to PM emissions and the TSP emission factors can be estimated by multiplying PM10 emission factors by 2.1.

*** Since this is a double screener, the emission factor is the sum of emission factors for the screening and fine screening in AP-42, Table 11.19.2-2 (01/95). Assume all TSP emissions equal to PM emissions. AP-42, Table 11.19.2-2 indicates that TSP emission factors may be estimated by multiplying PM10 emission factors by 2.1.

Methodology

Uncontrolled Emissions (lbs/hr/unit) = Maximum Throughput (tons/hr) x Uncontrolled Emission Factor (lb/ton)

Uncontrolled Emissions (tons/yr) = Uncontrolled Emissions (lbs/hr/unit) x Number of Units x 8760 hr/yr x 1 ton/2000 lbs

Controlled Emissions (lbs/hr/unit) = Maximum Throughput (tons/hr) x Controlled Emission Factor (lb/ton)

Controlled Emissions (tons/yr) = Controlled Emissions (lbs/hr/unit) x Number of Units x 8760 hr/yr x 1 ton/2000 lbs

Appendix A: Emission Calculations
Potential Emissions
From the Aggregate Piles (Fugitive Emissions)

Company Name: Heckett MultiServ Plant 7
Address City IN Zip: W. End Slag Dump, East Chicago, IN 46312
SSM #: 089-16532-00341
Reviewer: ERG/YC
Date: January 7, 2003

1. Emission Factors:

According to AP42, Chapter 13.2.4 - Aggregate Handling and Storage Piles, the emission factor of PM for aggregate handling process can be estimated from the following equation:

$$Ef = \frac{.0032 \times (U/5)^{1.3} \times k}{(M/2)^{1.4}}$$

where:

Ef = Emission Factor (lbs/ton)	
k = Particle size multiplier =	0.74 for PM and 0.35 for PM10
U = Mean wind speed (mph) =	12 mph
M = Moisture content (%) =	4.1 % (provided by the source)

Therefore,

PM Emission Factor =	0.0027 lbs/ton process
PM10 Emission Factor =	0.0013 lbs/ton process

2. Potential to Emit PM/PM10 before Control:

Throughput Rate:	200 tons/hr	(3 piles total)
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Potential PM =	200 ton/hr x 0.0027 lbs/ton x 8760 hr/yr x 1 tons/2000 lbs =	2.37 tons/yr
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Potential PM10 =	200 ton/hr x 0.0013 lbs/ton x 8760 hr/yr x 1 tons/2000 lbs =	1.12 tons/yr
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